



County of San Diego

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September 19, 2018

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, District of Columbia 20554

RE: Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84; Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 17-79

Dear Ms. Dortch:

On behalf of the County of San Diego, California, I write to express the County's opposition to the Federal Communications Commission's (FCC) proposed Declaratory Ruling and Third Report and Order regarding state and local governance of small cell wireless infrastructure deployment. The proposal would negatively influence the review process needed for small cell deployments and impact the County's oversight of publicly owned infrastructure.

The County of San Diego supports improved broadband accessibility, but the County is concerned with the limited 60-day shot clock periods for local governments to process small cell applications on preexisting structures. Under the proposal, if the County does not process applications in the mandated period, the County would have inadequate recourse. The County of San Diego needs additional time to ensure full environmental and safety compliance and to receive proper input from the community. Local governments, like the County, need added protections to reduce the potential burdens and to ensure the right decision is made as each site is reviewed around the County of San Diego. Furthermore, our experience with such installations has been that such cell sites require significant excavations to connect them with fiber-optic cable and yet there are no requirements in the proposed rulings to address the needed road repairs.

San Diego County is also concerned the proposal would impede local government involvement in the process of deploying small cell technology. Currently, the County works with providers on the location and size of wireless infrastructure. Our process has been successful and helped the infrastructure better integrate into neighborhoods around the County through visual impact

analysis, noise analysis, and other steps to preserve community character. Unfortunately, the proposal could limit the County of San Diego's ability to oversee right of ways and manage private use of public property around the County, including the FCC's interpretation of "fair and reasonable compensation" as meaning approximately \$270 per small cell site.

The County of San Diego has effectively worked with private business to improve broadband infrastructure across the region; however, we oppose this proposal as the actions would result in restrictions to local authority.

Thank you for your consideration of the County of San Diego's position on this proposal. Please do not hesitate to contact me if you would like to further discuss the impact of this proposal on the County of San Diego.

Sincerely,

A handwritten signature in dark ink, appearing to read "Geoff Patnoe", written in a cursive style.

GEOFF PATNOE

Director

Office of Strategy and Intergovernmental Affairs
County of San Diego